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ATLANTIC, INC. and JAMES DARDASHTI
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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

18 FASTCAP, LLC and PAUL AKERS

19 Plaintiffs,

20 vs.
21

22 ATLANTIC, INC. and JAMES
DARDASHTI,
23

24 Defendants.
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CASE NO. CO8-05364 EDL

STIPULATION REGARDING
EXTENSION OF TIME TO
RESPOND TO COMPLAINT;
[PROPOSED] ORDER THEREON

[Local Rule 6-2(a)]

[Declaration of Daniel M. Cislo
submitted concurrently herewith]

STIPULATION

WHEREAS, Defendants Atlantic, Inc. and James Dardashti (collectively referred to as "Atlantic") were served with the Complaint on or about January 12, 2009;

WHEREAS, Atlantic's response to the Complaint, which will be its first pleading in this case, is due on or about February 2, 2009;

WHEREAS, the parties intend to discuss settlement of this matter in the additional period of time that a thirty-day extension of time would provide;

WHEREAS, Atlantic has not requested the additional time to respond to the Complaint for purposes of delay;

WHEREAS, counsel for Plaintiffs FastCap, LLC and Paul Akers (collectively referred to as "FastCap") has consented to an extension of time until March 2, 2009 for Atlantic to respond or otherwise plead in response to the Complaint;

NOW THEREFORE, FastCap and Atlantic by and through their counsel of record, hereby agree and stipulate that Atlantic shall have until March 2, 2009 to respond or otherwise plead in response to the Complaint.

Accordingly, the Order Setting Initial Case Management Conference and ADR Deadlines in this case are agreed by the parties to be changed as follows:

CISLO & THOMAS LLP
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3/10/2009	Last day to: <ul style="list-style-type: none"> • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan • file ADR Certification signed by Parties and Counsel • file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference 	<u>FRCivP_26(f)&ADR L.R.3-5</u> <u>Civil_L.R. 16-8 (b) & ADR L.R. 3-5(b)</u> <u>Civil_L.R. 16-8(c) & ADR L.R. 3-5(b) & (c)</u>
3/24/2009	Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contents of Joint Case Management Statement	<u>FRCivP26(a) (1)</u> <u>Civil_L.R. 16-9</u>
4/3/2009	INITIAL CASE MANAGEMENT CONFERENCE (CMC) in Ctrm E, 15 th Floor, SF at 10:00 AM	<u>Civil_L.R. 16-10</u>

ZIMMERMAN & CRONEN, LLP

CISLO & THOMAS LLP

By: _____
 Harris Zimmerman, Esq.
 Michael James Cronen, Esq.

By: _____
 Daniel M. Cislo, Esq.
 Mark D. Nielsen, Esq.

Attorneys for Plaintiff,
 FASTCAP, LLC and PAUL
 AKERS

Attorneys for Defendant,
 ATLANTIC, INC. and JAMES
 DARDASHTI

Dated: January ____, 2009

Dated: January ____, 2009

IT IS SO ORDERED.

Dated: January ____, 2009

 HONORABLE ELIZABETH D. LAPORTE
 United States Magistrate Judge

CISLO & THOMAS LLP

Attorneys at Law

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By:

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Mark D. Nielsen, Esq.

Attorneys for Plaintiff,
FASTCAP, LLC and PAUL
AKERS

Attorneys for Defendant,
ATLANTIC, INC. and JAMES
DARDASHTI

Dated: January 17th, 2009Dated: January 17th, 2009

IT IS SO ORDERED.

Dated: January 26, 2009

HONORABLE ELIZABETH D. LAPORTE
United States District Court Judge

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